

EXHIBIT C

Troy A. Pacella

From: Leander James <ljames@jvwlaw.net>
Sent: Friday, March 15, 2024 10:03 AM
To: Carla Varriale-Barker; leah forster
Cc: Troy A. Pacella; atwersky@twerskylaw.com; Lucia Saitta; Ilana Neufeld; mguttmann@twerskylaw.com; jlowe@twerskylaw.com; Kimberly Connolly
Subject: FW: Sokolovsky - Non-Party Witness Deposition of Leah Forster
Attachments: Pl. Supplemental Disclosure - Final.pdf; Invoices for Treatment-Abroms.pdf; Invoices-Proverdi.pdf; Zelle - Plaintiff.pdf; Zelle-Forster.pdf; Zelle-Malky.pdf

Importance: High

Dear Ms. Varriale-Barker,

I believe we already sent this information in discovery. See attached. However, we will double check.

Respectfully,

Leander L. James, of the firm

JAMES, VERNON & WEEKS, P.A.
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Inland Northwest Office
1626 LINCOLN WAY
COEUR D'ALENE, ID 83814
Telephone: (208) 667-0683
Toll-Free: (888) 667-0683
Facsimile: (208) 664-1684

New York City Office
7th Floor
20 Vesey Street
New York, NY 10007
Telephone: (347) 852-8061
Toll-Free: (888) 667-0683
Facsimile: (208) 664-1684

Rochester New York Office
500 Canal View Boulevard
Suite 600
Rochester, New York 14623
Telephone: (347) 852-8061
Toll-Free: (888) 667-0683
Facsimile: (208) 664-1684

e-mail: ljames@jvwlaw.net
Facebook: <https://www.facebook.com/leander.james.7>
Home Page: <http://www.jvwlaw.net/>

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From: Lucia Saitta <lucia@jvwlaw.net>
Sent: Thursday, March 14, 2024 5:12 PM
To: Leander James <ljames@jvwlaw.net>
Cc: Brianna Espeland <brianna@jvwlaw.net>
Subject: FW: Sokolovsky - Non-Party Witness Deposition of Leah Forster
Importance: High

I sent what Leah F provided to Leah S already. (See attached)

Sincerely,
Lucia A. Saitta
Paralegal to Leander L. James, IV
and Brianna M. Espeland
(208) 667-0683
lucia@jvwlaw.net



1626 Lincoln Way
Coeur d'Alene, ID 83814
Telephone: (208) 667-0683
Facsimile: (208) 664-1684

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From: Carla Varriale-Barker <CVarriale@SMSM.com>
Sent: Thursday, March 14, 2024 5:00 PM
To: leah forster <lilatunes@gmail.com>
Cc: Leander James <ljames@jvwlaw.net>; Troy A. Pacella <TPacella@SMSM.com>; atwersky@twerskylaw.com; Lucia Saitta <lucia@jvwlaw.net>; Ilana Neufeld <ineufeld@twerskylaw.com>; mguttmann@twerskylaw.com; jlowe@twerskylaw.com; Kimberly Connolly <KConnolly@SMSM.com>
Subject: Re: Sokolovsky - Non-Party Witness Deposition of Leah Forster

Please provide all of that and the communications specified in the rider as soon as possible-we cannot complete your deposition without the completed search and production.

Leander -if you have the detailed email referenced below please provide it to us tomorrow.

Thank you all.

Sent from my iPhone

On Mar 14, 2024, at 7:56 PM, leah forster <lilatunes@gmail.com> wrote:

Hi all !

I emailed Leah all the records i have of money transactions- it was very difficult to go back and find specifics. She has a detailed email from me with a breakdown as best as I can procure

I am putting together messages from appel and asher.

I have no idea who chiam is- i dont remember

On Thu, Mar 14, 2024, 7:44 PM Leander James <ljames@jvwlaw.net> wrote:

Dear Ms. Forester,

I represent Ms. Leah Sokolovsky. For what it is worth, I encourage you to produce the documents requested below to the extent you have them. If there is an undue burden on you to do so, perhaps you can coordinate with Ms. Varriale-Barker for her clients to assist in that regard.

Respectfully,

Leander L. James, of the firm

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Toll-Free: (888) 667-0683

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New York City Office

7th Floor

20 Vesey Street

New York, NY 10007

Telephone: (347) 852-8061

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Facsimile: (208) 664-1684

Rochester New York Office

500 Canal View Boulevard

Suite 600

Rochester, New York 14623

Telephone: (347) 852-8061

Toll-Free: (888) 667-0683

Facsimile: (208) 664-1684

e-mail: ljames@jwlaw.net

Facebook: <https://www.facebook.com/leander.james.7>

Home Page: <http://www.jwlaw.net/>

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From: Troy A. Pacella <TPacella@SMSM.com>
Sent: Thursday, March 14, 2024 1:44 PM
To: leah forster <lilatunes@gmail.com>; Carla Varriale-Barker <CVarriale@SMSM.com>
Cc: atwersky@twerskylaw.com; Lucia Saitta <lucia@jvwlaw.net>; Ilana Neufeld <ineufeld@twerskylaw.com>; Leander James <ljames@jvwlaw.net>; mguttmann@twerskylaw.com; jlowe@twerskylaw.com; Kimberly Connolly <KConnolly@SMSM.com>
Subject: RE: Sokolovsky - Non-Party Witness Deposition of Leah Forster

Ms. Forster,

Our office has since sought relief from the Court with respect to the documents requested within Exhibit A annexed to the subpoena provided by our office.

Within your deposition testimony you indicated that you are in possession of documents responsive to our requests. To date we have not received such documents.

Despite your claims of providing all documents to Plaintiff's attorney, we again request that you conduct a search of your records and provide our office with any responsive documents. This includes, but is not limited to the following:

- **Recent Communications with the Plaintiff:** All recent communications between yourself and the Plaintiff through WhatsApp and text messages, as referenced on pages 12, 13, 15, and 79 of your deposition transcript.
- **Payments to the Plaintiff:** As discussed on pages 44-45 of your deposition, we request records of any payments sent to the Plaintiff via Venmo, CashApp, or similar platforms.